



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMB:AEG
F.#2010R00172

271 Cadman Plaza East
Brooklyn, New York 11201

April 6, 2011

By FedEx and ECF

Deborah Colson, Esq.
Justine Harris, Esq.
Colson & Harris LLP
10 E. 40th Street, Suite 3307
New York, New York 10016

Re: United States v. Mohammed Wali Zazi
Criminal Docket No. 10-60 (S-1)(RJD)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, and subject to the provisions set forth in the Stipulation and Order signed by the parties on April 8, 2010 and ordered by the Court on April 30, 2010 and the Stipulation and Order signed by the parties and ordered by the Court on December 3, 2010, the government provides the following supplemental discovery. The government hereby renews its previous request for reciprocal discovery.

Enclosed is a CD, Bates-numbered P-MZ-1379, containing recordings of conversations the government may use in its case-in-chief at trial. The government obtained these recordings pursuant to the Foreign Intelligence Surveillance Act, 50 U.S.C. § 1801 et seq. ("FISA"). Also enclosed are draft translations of the recordings, Bates-numbered P-MZ-1380 through P-MZ-1417.

As we have discussed, the government will treat the defendant's motion to suppress FISA-derived evidence, filed February 7, 2011, as seeking suppression of the above recordings.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Andrew E. Goldsmith
Assistant U.S. Attorney
(718) 254-6498

Enclosures

cc: Clerk of the Court (RJD) (w/out encls.)